

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI**

**STACY ARNOLD,**

**Plaintiff,**

**v.**

**CITY OF ST. JOSEPH, ET AL.,**

**Defendants.**

)  
)  
)  
)  
)  
)  
)  
)  
)  
)  
)

**Case No. 19-CV-06137-BP**

**DEFENDANT ST. JOSEPH PUBLIC LIBRARY'S SECOND UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**

COMES NOW, Defendant St. Joseph Public Library ("Defendant"), by and through its attorneys of record, and respectfully moves this Court for an extension of time to file its answer or other responsive pleading to Plaintiff's Complaint for Declaratory Relief, Injunctive Relief and Damages (ECF No. 1).<sup>1</sup> In support of this motion Defendant states as follows:

1. On or about November 25, 2019, counsel for Defendant sought an unopposed extension of time until December 9, 2019, to complete and file an answer or other responsive pleading to Plaintiff's Complaint for Declaratory Relief, Injunctive Relief and Damages (ECF No. 1). Therefore, this motion is timely.

2. Counsel for Defendant seeks an additional eleven (11) day extension of this deadline, or until December 20, 2019, due to counsel for Defendant's heavy briefing schedules in other matters, has been unable to complete the answer as presently due. Defendant believed it would be able to complete its responsive pleading during the extension period but was unable to

---

<sup>1</sup> In seeking an extension, Defendant expressly does not waive any other affirmative defenses available to it in this action including those enumerated in Fed.R.Civ.P. 8, 9 & 12. To the extent necessary to preserve any such defenses, Defendant raises the same herein.

do so due to the press of these other matters.

3. Counsel for Defendant has contacted Plaintiff and she has no objection to this requested extension.

4. Plaintiff will not be prejudiced by the granting of this extension and this extension will not materially interfere with any of the other deadlines in this case.

WHEREFORE, Defendant St. Joseph Public Library requests an additional eleven (11) days, until December 20, 2019, to answer or otherwise plead to Plaintiff's Complaint for Declaratory Relief, Injunctive Relief and Damages (ECF No. 1).

Respectfully submitted,

McANANY, VAN CLEAVE & PHILLIPS, P.A.  
10 E. Cambridge Circle Drive, 300  
Kansas City, Kansas 66103  
Telephone: (913) 371-3838  
Facsimile: (913) 371-4722  
E-mail: [ggoheen@mvplaw.com](mailto:ggoheen@mvplaw.com)

By: /s/ Gregory P. Goheen

Gregory P. Goheen

#58119

Attorneys for Defendant St. Joseph Public Library

**CERTIFICATE OF SERVICE**

I hereby certify that on the 9<sup>th</sup> day of December, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and sent a copy via U.S. mail, postage prepaid to the following:

Stacy Arnold  
500 Westover Drive #11589  
Sanford, NC 27330  
Plaintiff, *pro se*

Mark Beam-Ward  
Beam-Ward, Kruse, Wilson & Fletes, LLC  
8645 College Boulevard, Suite 250  
Overland Park, KS 66210  
Attorneys for Defendant Roger Clary

Christopher L. Heigele  
Steven F. Coronado  
Baty Otto Coronado, PC  
4600 Madison Avenue, Suite 210  
Kansas City, MO 64112  
Attorneys for Defendants City of St. Joseph and Rebecca Hailey

/s/ Gregory P. Goheen